

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WATCH TOWER BIBLE AND TRACT SOCIETY OF  
PENNSYLVANIA,

Plaintiff,

-against-

THE TRUTH AND TRANSPARENCY FOUNDATION,  
RYAN C. McKNIGHT, and ETHAN G. DODGE,

Defendants.

**No. 1:20-cv-03366 (MKV)**

**NOTICE OF SETTLEMENT AND  
MOTION FOR ENTRY OF JUDGMENT ON CONSENT**

Plaintiff Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower”), by its attorneys, Cowan, Liebowitz & Latman, P.C., and Defendants The Truth and Transparency Foundation, Ryan C. McKnight, and Ethan G. Dodge (“Defendants”), by their attorneys, Long & Associates PLLC (collectively, the “Parties”), hereby notify the Court of their settlement of this action and respectfully move the Court to enter a Final Order and Judgment on Consent in the form submitted herewith.

1. This motion for entry of a Consent Judgment represents part of the Parties’ amicable settlement of this action.
2. Except for the injunctive relief provided by the Final Order and Judgment on Consent, and subject to entry of the Final Order and Judgment on Consent, Watch Tower agrees to dismiss with prejudice all other claims in this action against Defendants.
3. The Final Order and Judgment on Consent shall be enforceable upon entry. Watch Tower and Defendants hereby waive findings of fact, conclusions of law, a statement of decision and any right to set aside the Final Order and Judgment on Consent, appeal therefrom, or otherwise contest the validity of the Final Order and Judgment on Consent.

4. This Court shall retain jurisdiction to enforce the terms of the Parties' settlement agreement and the Final Order and Judgment on Consent in the form submitted herewith.

Dated: July 17, 2020

/s/ Thomas Kjellberg  
Thomas Kjellberg (txk@cjl.com)  
COWAN, LIEBOWITZ & LATMAN, P.C.  
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New York, NY 10036-1525  
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Dated: July 17, 2020

/s/ Ryan E. Long  
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